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CORRECTIVE MEASURES IMPLEMENTATION PLAN LANDFILL A SOLID WASTE  
MANAGEMENT UNIT 25 (SWMU25) REVISION I NS MAYPORT FL  
2/20/2009  
TETRA TECH

**NAVAL STATION MAYPORT  
CORRECTIVE MEASURES IMPLEMENTATION PLAN  
ATLANTIC MARINE, INC.  
SOLID WASTE MANAGEMENT UNIT 25**

**FACILITY IDENTIFICATION NUMBER FL9 170 024 260**

**1. OBJECTIVE**

A Resource Conservation and Recovery Act (RCRA) Statement of Basis (SB) for Solid Waste Management Unit (SWMU) 25, Atlantic Marine, Inc., completed public comment on November 12, 2008. The SB stipulated the implementation of Land Use Controls (LUCs) including Engineering Controls (ECs), Institutional Controls (ICs), and groundwater monitoring to prevent unacceptable human health risks from exposure to contaminated surface soil or groundwater at SWMU 25. The objective of this Corrective Measures Implementation Plan (CMIP) is to provide information on how the Corrective Measures selected in the SB for SWMU 25 are implemented, maintained, and monitored.

Pursuant to RCRA, as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA), the Florida Department of Environmental Protection (FDEP) issued the current HSWA permit to Naval Station (NAVSTA) Mayport on August 30, 2005. The HSWA permit requires the CMIP to include identification of the LUC objectives.

The requirements set forth in this CMIP shall supersede the requirements of the LUC Memorandum of Agreement signed on September 7, 1999, by the United States Navy (Navy), the United States Environmental Protection Agency, and FDEP. The inspections and reporting requirements described herein will be effective immediately upon approval of this CMIP by the FDEP. Once put into effect, the requirements set forth in this document will remain applicable to SWMU 25 during Navy ownership as well as subsequent ownership of the SWMU unless otherwise amended by the Navy and with FDEP concurrence.

**2. SWMU DESCRIPTION AND BACKGROUND**

SWMU 25 is located in the northeastern part of NAVSTA Mayport, southeast of the turning basin. SWMU 25 (Atlantic Marine, Inc.) was used to conduct the maintenance and repair of Navy ships under the contract to the Supervisor of Shipbuilding, Conversion, and Repair since 1980. Activities at this 1.5-acre area include abrasive media stripping, fabrication of metal parts, metal working, degreasing, paint stripping, welding, automotive maintenance and repair, as well as other ship support operations. Contaminants could have potentially been released from oils used in milling of parts, heavy metals in paints, solvents used in cleaning parts, and fuel storage.

The RCRA Facility Investigation (RFI) and Corrective Measures Study (CMS) for SWMU 25 were submitted to the FDEP in December 1996 and June 2007, respectively. The RFI concluded that SWMU 25 has been impacted by low concentrations of pesticides in the soil and metals in the groundwater. Corrective measures recommended in the CMS and selected in the SB are LUCs including ECs, ICs, and groundwater monitoring. Concrete/asphalt pavement serves as a cover to reduce exposure to surface soil contaminants of concern (COCs) in excess of the FDEP Direct

Exposure Residential Soil Cleanup Target Levels (SCTLs). ICs are in place to prevent the site from being used for residential purposes, and groundwater monitoring is being used to track the progress of COC reductions in groundwater. LUCs will be maintained until the concentrations of COCs in the soil and groundwater are at such levels to allow for the unrestricted use and unlimited exposure of the SWMU 25 property as determined by the FDEP.

Groundwater at SWMU 25 was investigation and evaluated in conjunction with SWMU 1, 23, and 24. The corresponding groundwater LUC areas apply to all four of these SWMUs and cover approximately 1.61 acres (see Figure 1 in Attachment 1). The corresponding soil LUC area covers approximately 0.18 acres (see Figure 2 in Attachment 1). A table detailing the COCs for their respective media is presented below:

**SWMU 25 COCs**

Media of Concern	COCs
Surface Soil	<ul style="list-style-type: none"><li>• Aldrin</li><li>• Dieldrin</li></ul>
Groundwater	<ul style="list-style-type: none"><li>• Antimony</li><li>• Arsenic</li><li>• Silver</li><li>• Zinc</li></ul>

**3. CORRECTIVE MEASURES**

**a. Engineering Controls:** The following are the Corrective Measures for the EC corrective action to be implemented at SWMU 25:

1. The Navy will maintain the existing concrete/asphalt cover over the soil areas contaminated with concentrations of aldrin and dieldrin in excess of FDEP Direct Exposure Residential SCTLs. If a repair is made to the EC, the Navy will ensure the surface is maintained to prevent direct exposure.

Figure 2 in Attachment 1 of this CMIP shows the impacted area of soil contamination. The EC for soil cover applies to the area contained within the LUC boundaries shown in this Attachment. Damage to the soil/sediment pavement (e.g., potholes, missing segments, or severely cracked/eroded areas, etc.) discovered during inspection shall be repaired with materials comparable to the existing concrete/asphalt materials.

**b. Institutional Controls:** The following are the Corrective Measures for the LUC corrective action to be implemented at SWMU 25 until such time as the concentrations of COCs in the soil and groundwater are at levels to allow for unrestricted use and unlimited exposure:

1. Prevent disturbance of the concrete/asphalt covering contamination unless prior approval/coordination is obtained from the FDEP.

2. Prohibit the excavation and uncontrolled removal/disturbance of soil containing COC concentrations in excess of FDEP Direct Exposure Residential Soil Cleanup Target Levels unless prior written approval is obtained from the FDEP.
  3. Prevent exposure to contaminated groundwater underlying SWMU 25 including, but not limited to, human consumption, dewatering, irrigation, heating/cooling purposes, and industrial processes, unless prior written approval is obtained from the FDEP.
  4. Prohibit residential development or use of the SWMU until corrective measure(s) allow for unrestricted use and unlimited exposure; and prior written approval is obtained from the Navy and FDEP. Prohibited residential development and uses shall include, but are not limited to, any form of housing, child-care facilities, pre-schools, elementary schools, secondary schools, playgrounds, or full-time adult convalescent or nursing care facilities.
  5. Maintain the integrity of any existing or future monitoring or remediation system(s).
- c. Monitoring:** The following monitoring of the Corrective Measures for the LUC corrective action will be implemented at SWMU 25:
1. Physical inspections of SWMU 25 will be conducted by the Navy annually to ensure that the implemented LUCs are being maintained:
  2. Monitor the SWMU 25 groundwater semi-annually to assess the possible contaminant migration and attenuation of the following COCs:
    - Antimony
    - Arsenic
    - Silver
    - Zinc

Figure 1 (Attachment 1) shows the impacted area of groundwater contamination.

At the conclusion of each monitoring event at the SWMU, a report will be submitted to the FDEP no later than 60 days after laboratory results have been made final. In the event two consecutive monitoring events determine that detections of antimony, arsenic, silver, and zinc in groundwater at SWMU 25 are below FDEP Groundwater Cleanup Target Levels, then groundwater monitoring may be terminated upon the approval of the FDEP.

#### **4. CORRECTIVE ACTION IMPLEMENTATION**

The following implementation actions shall be executed by the Navy to ensure that the Corrective Measures for SWMU 25 are met and maintained:

- a. CMIP Distribution:** Within 30 days of receiving FDEP approval of this CMIP, the Navy will place the CMIP in the Information Repository located at the Jacksonville

Public Library – Beaches Branch, 600 3<sup>rd</sup> Street, Neptune Beach, Florida, 32266, (904) 241-1141.

- b. **Implementing Corrective Actions:** Semi-annual monitoring to assess natural attenuation parameters and possible contaminant migration at SWMU 25 shall begin within 6 months of the FDEP's approval of this CMIP.
- c. **SWMU Inspections:** Upon the FDEP's approval of this CMIP, the Navy will conduct annual physical inspections of SWMU 25 to confirm compliance with Corrective Measures. The FDEP will be notified within 60 days of the discovery of any activities inconsistent with the LUCs. Any activity inconsistent with the Corrective Measures objectives or use restrictions, or any other action that may interfere with the effectiveness of the Corrective Measures, will be addressed by the Navy upon discovery. Continued and/or additional groundwater monitoring may be required once these inconsistent activities have been corrected.
- d. **Compliance Reporting:** Upon FDEP's approval of this CMIP, the Navy will provide to the FDEP an annual Corrective Measures Compliance Certificate (consistent with Attachment 2) after inspection of SWMU 25 has been completed. A summary of the analytical results from the semi-annual groundwater sampling shall accompany the Corrective Measures Compliance Certificate. Should any deficiencies be discovered during annual inspection, the Navy will provide FDEP a written description of the deficiencies and the measures that are proposed to correct the deficiencies within 60 days of the discovery.
- e. **Five Year Reviews:** Although five-year reviews are not required under RCRA, the Navy will conduct five-year reviews of the corrective measures at SWMU 25 to ensure that the corrective measures remain protective of human health and the environment.
- f. **Notice of Planned Property Conveyances:** Although the Navy may later transfer these procedural responsibilities to another party by contract, property transfer agreement, or through other means, the Navy shall retain ultimate responsibility for Corrective Measures integrity. In the event of any conveyance of the SWMU 25 property to any other agency, person, or entity, the Navy shall provide notice to the FDEP of such intended conveyance at least 6 months prior to the conveyance. If it is not possible for the Navy to notify the FDEP at least 6 months prior to the conveyance, then the Navy will notify the FDEP as soon as possible, but no later than 60 days prior to the conveyance. The notice shall describe the mechanism for maintenance of Corrective Measures and the responsible party. In the event of a property transfer, the Navy and FDEP shall have the opportunity to review the intended deed restrictions.
- g. **Changes and Termination of Corrective Measures:** The Navy shall not modify or terminate Corrective Measures, implementation actions, or modify land use without approval by the FDEP. The Navy shall seek prior FDEP concurrence before any anticipated action that may disrupt the effectiveness of the Corrective Measures or any action that may alter or negate the need for Corrective Measures. When the Navy determines, with the FDEP concurrence, that one or more of the Corrective Measures at SWMU 25 are no longer needed for protection of human health and the environment, the Navy shall complete the appropriate documentation.

**5. POINTS OF CONTACT**

Listed below is the point of contact information for the Navy and FDEP.

**Navy**

Diane Racine  
Environmental Division  
Public Works Office  
Naval Station Mayport  
Mayport, FL 32228-0067  
(904) 270-6730, extension 208  
Diane.Racine@navy.mil

**FDEP**

John Winters, PG  
FDEP, Bob Martinez Building  
Federal Facilities Review Section  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
(850) 245-8999  
(850) 245-7690 (FAX)  
John.Winters@dep.state.fl.us

**6.     REFERENCES**

ABB Environmental Services, Inc., 1996. Resource Conservation and Recovery Act Facility Investigation, Group III Solid Waste Management Units, U.S. Naval Station Mayport, Florida. Prepared for the Department of the Navy, Southern Division Naval Facility Engineering Command. December.

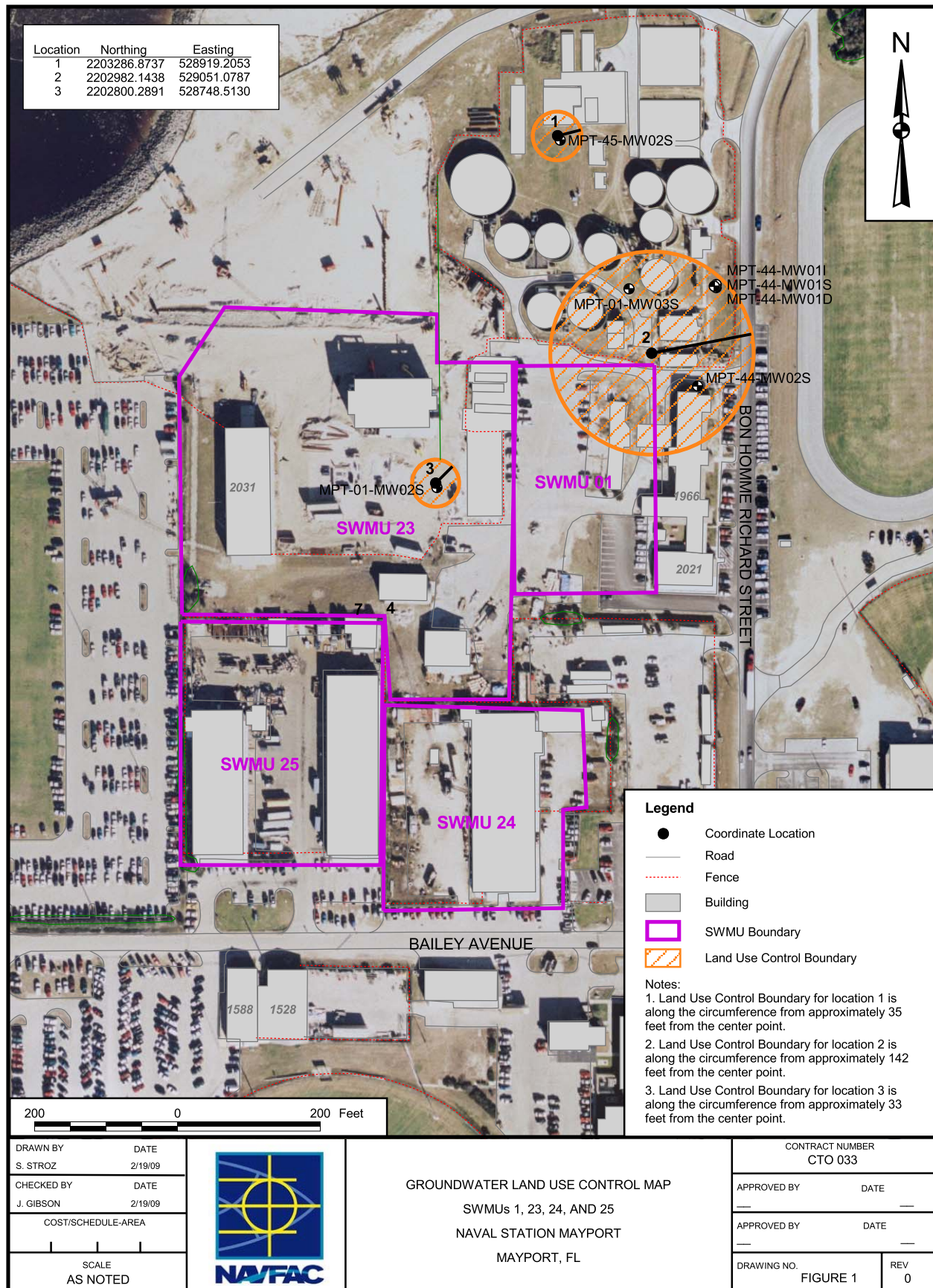
TtNUS, 2008. Statement of Basis for SWMU 25 – Atlantic Marine, Inc., Naval Station Mayport, Jacksonville, Florida, September.

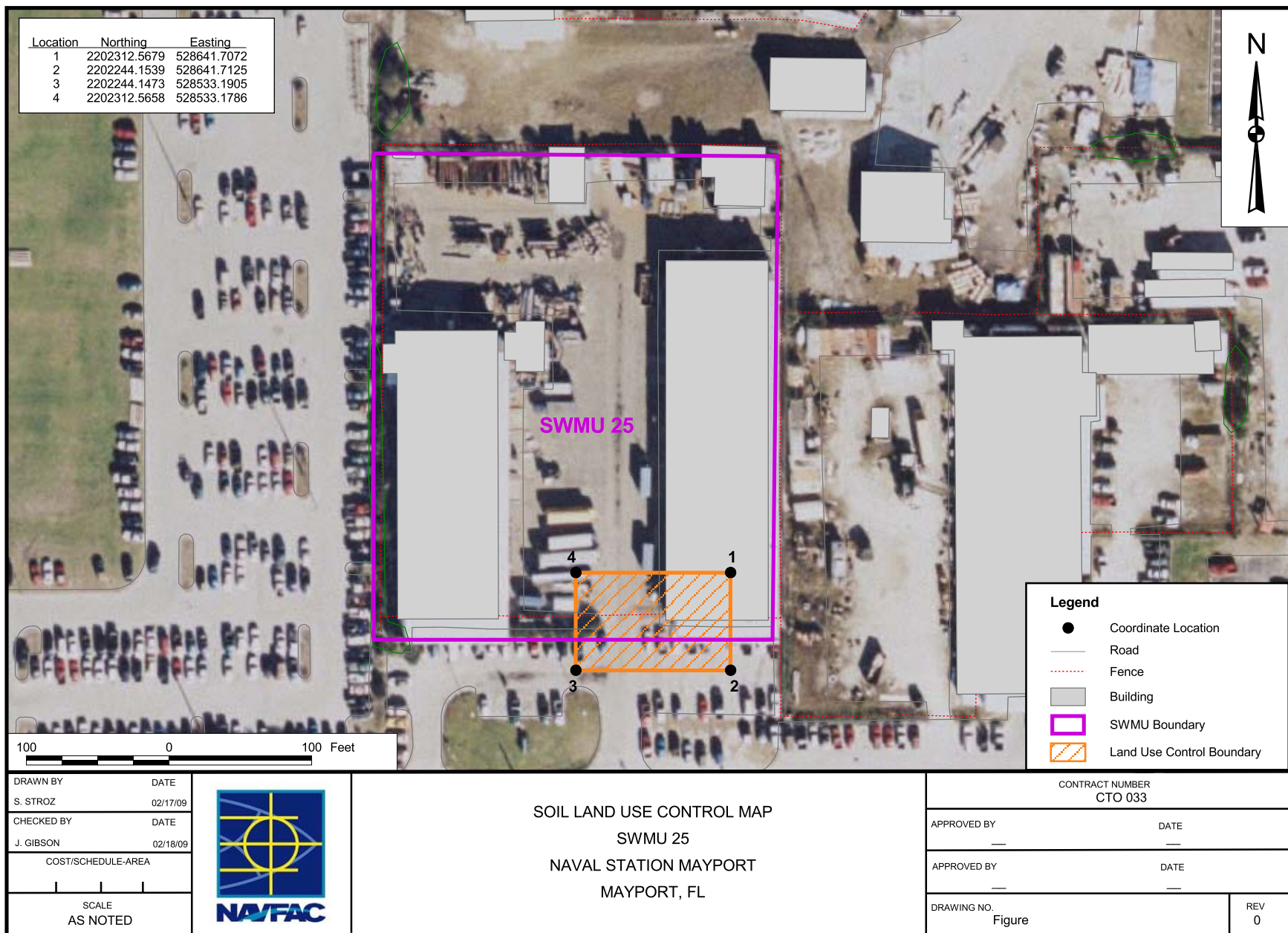
TtNUS, 2007. Corrective Measures Study Addendum for Solid Waste Management Units 1, 23, 24, and 25, Naval Station Mayport, Florida. June.

**ATTACHMENT 1**

**FIGURES OF CORRECTIVE ACTIONS FOR SOIL AND GROUNDWATER**







**ATTACHMENT 2**

**ANNUAL CORRECTIVE MEASURES COMPLIANCE CERTIFICATE**



**ANNUAL CORRECTIVE MEASURES COMPLIANCE CERTIFICATE**  
**SWMU 25 – ATLANTIC MARINE, INC.**  
Naval Station Mayport  
Facility I.D. No.: FL9 170 024 260

SWMU and LUC boundaries are shown in Attachment 1 of the SWMU 25 CMIP.

This evaluation covers the period from **1 January** \_\_\_\_\_ **through 31 December** \_\_\_\_\_. This form shall be submitted by **1 March** of the year following the reporting period.

**CERTIFICATION CHECKLIST**

	IN COMPLIANCE	NON- COMPLIANCE	SEE COMMENT	NOT APPLICABLE
1) No residential development or use on parcel including but not limited to, any form of housing, child-care facilities, pre-schools, elementary schools, secondary schools, playgrounds, or full-time adult convalescent or nursing care facilities. <u>Comments:</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) No excavation or uncontrolled removal/disturbance of soil/sediment with concentration of COCs exceeding FDEP Direct Residential Exposure SCTLs (unless previously approved by the Navy). <u>Comments:</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) No disturbance of the concrete or asphalt cover in the LUC areas (unless previously approved by the FDEP and the Navy). <u>Comments:</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) No human consumption of groundwater. <u>Comments:</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3) No groundwater use at the site.

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Comments:

I, the undersigned, hereby certify that I am an authorized representative of the above named property owner and that the above described remedies and controls have been complied with for the period noted. Alternately, any known deficiency(ies) and the owner's completed or planned actions to address such deficiency(ies) are described in the attached page explaining the deficiency(ies).

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

*Mail completed form(s) to:*

Chief, RCRA Programs Branch  
U.S. Environmental Protection  
Agency Region IV  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303-3104

Florida Dept of Environmental Protection  
Bob Martinez Building  
Federal Facilities Review Section  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Commander  
NAVFAC SE  
Attn: Director, Environmental  
Services Business Line  
Naval Air Station Jacksonville  
Box 30  
Jacksonville, FL 32212-0030